ORIGINAL

BEFORE THE
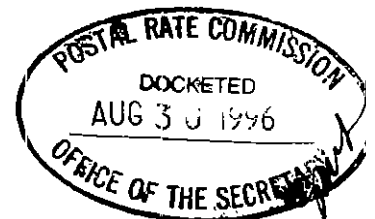POSTAL RATE COMMISSION
WASHINGTON, D.C.   20268-0001

Special Services Fees and Classifications)   Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-65-69)
(August 30, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of

the Postal Rate Commission, the Office of the Consumer Advocate

hereby submits interrogatories and requests for production of

documents.   Instructions included with OCA Interrogatories 1-4 to

the United States Postal Service dated June 19, 1996, are hereby

incorporated by reference.

Respectfully submitted,

GAIL WILLETTE
Director
Office of the Consumer Advocate

DAVID RUDERMAN
Attorney

OCA/USPS-65.   This interrogatory refers to the data files and

programs contained in SSR-84 for TRACS Highway and to the program

documentation in SSR-82.   The first program of SSR-82 is named

TRACS.EXPAND.HWY.PQ495.CNTL(SURVEY) and it reads a flat file

named TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT.

a.   Please confirm that the flat file

      TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT is named

      ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT on the tapes accompanying

      SSR-84.   If you do not confirm, please state which SSR-84

      file is a copy of TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT or

      provide a copy of TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT.

b.   Please refer to page 108 of SSR-84.   Please confirm that

      ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT was created by copying file

      TRACSSMN.SAFE.HIGHWAY.PQ495.SURVEY.TEXT, which is a

      different file name than TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT.

      If you do not confirm, please explain what file was copied

      to produce the file ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT.

c.   Please confirm that file

      TRACSSMN.SAFE.HIGHWAY.PQ495.SURVEY.TEXT is an exact copy of

      file TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT with the only change

      being the insertion of ".SAFE" into the file name.   If you

      do not confirm, please list all modifications made to

produce the "SAFE" file

TRACSSMN.SAFE.HIGHWAY.PQ495.SURVEY.TEXT.

d. Please provide a program listing showing that

TRACS.EXPAND.HWY.PQ495.CNTL(SURVEY) executes properly with

ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT as the input file instead

of TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT. If this is not

possible, please provide a program and data file that work

together.

e. Please provide a printout showing the first 60 records

(corresponding to the first 20 observations) of the flat

file ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT.

f. Please provide a printout showing the first 60 records

(corresponding to the first 20 observations) of the flat

file TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT.

g. Please refer to page 18 of SSR-82 and to page 108 of SSR-84.

Please confirm that the record length (LRECL) for

TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT is 250 but the record

length (LRECL) for ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT is only

180. Please explain the reason for this difference and the

effects on the program TRACS.EXPAND.HWY.PQ495.CNTL(SURVEY).

h.   If any TRACS files are provided in response to this

      interrogatory, please provide the files on a diskette[1] (or

      other medium such as CD ROM) in a format easily accessible

      by PCs.

OCA/USPS-66.   Please refer to page 3 of SSR-82.   This lists 4

data sets (in addition to TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT)

that are supplied with the programs for TRACS Highway.

a.   Please provide these files on a diskette (or other medium

      such as CD ROM) in a format easily accessible by PCs.

b.   For each of these files, please confirm that the file

      provided in SSR-84 is an exact copy of the file listed on

      page 3 of SSR-82.

c.   For each SSR-84 file that is not a duplicate[2] of the

      corresponding SSR-82 file,

      i.   Please provide a file that is a copy of the

            corresponding file listed on page 3.

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[1] For example ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT is about 8.9
Megabytes in size, but compresses (using PKZIP) to only 367K.
The entire PQ495 highway data file would only occupy about a
quarter of a standard 1.44MB diskette. One diskette could
contain all four quarters of TRACS highway data.

[2] For example, DIVMTO.LOOKUP.FLAT.TEXT has record length of
130 (LRECL, page 273, SSR-82) and ALAHQN.DIVMTO.LOOKUP.FLAT.TEXT
has record length of 40 (LRECL, page 104, SSR-84).

ii. Please confirm that the unmodified SSR-82 programs

operate correctly on the SSR-84 data file. If you do

not confirm, please provide programs modified so that

they operate correctly on the data files provided in

SSR-84.

iii. If the file provided in SSR-84 was copied from a "SAFE"

file that differs from the actual file used in SSR-82,

please explain all modifications made to construct the

"SAFE" file.

OCA/USPS-67.   Please refer to page 342 of SSR-82. This lists 4

data sets that are supplied with the programs for TRACS Rail.

a. Please provide these files on a diskette (or other medium

such as CD ROM) in a format easily accessible by PCs.

b. For each of these files, please confirm that the file

provided in SSR-84 is an exact copy of the file listed on

page 342 of SSR-82.

c. For each SSR-84 file that is not a duplicate[3] of the

corresponding SSR-82 file,

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[3] For example, TRACSSMN.RAIL495.EXPAND.TEXT has record
length of 80 (LRECL, page 375 of SSR-82) and
ALAHQN.RAIL495.EXPAND.TEXT has record length of 111 (LRECL, page
121 of SSR-84).

i.   Please provide a file that is a copy of the
corresponding file listed on page 342.

ii. Please confirm that the unmodified SSR-82 programs
operate correctly on the SSR-84 data file. If you do
not confirm, please provide programs modified so that
they operate correctly on the data files provided in
SSR-84.

iii. If the file provided in SSR-84 was copied from a "SAFE"
file that differs from the actual file used in SSR-82,
please explain all modifications made to construct the
"SAFE" file.

OCA/USPS-68.   Please refer to the TRACS Amtrak estimation
programs overview beginning at page 322 of SSR-85. Please
provide the input data files for the Amtrak estimation on a
diskette (or other medium such as CD ROM) in a format easily
accessible by PCs.

OCA/USPS-69.   This question concerns the IOCS strata
definitions. At page 14 of the statistical systems documentation
(SSR-90), the strata are defined as follows:

> Post offices are stratified by size into ten CAGs,
> where the measure of size for each office is its total
> revenue receipts for the previous fiscal year.

More insight into stratification is provided in response to

OCA/USPS-31a:

> An additional stratum for mail processing offices that
> were split from CAG C customer service offices was
> established for variance computation . . . .

An explanation of CAG A/B tally stratification is presented in

response to OCA/USPS-33:

> Item F263 is used to separate CAG A/B tallies into
> three strata: '666666' for the BMC's, '555555' for the
> group of large offices, and '777777' for the remaining
> offices in CAG A and B.

In the attachments to the response to OCA/USPS-T5-13, sample

information by stratum is reported for CAG A/B as one stratum

producing a total of 9 strata instead of the 10 referred to in

SSR-90.

a.   Please provide the equivalent of the attachment to the

      response to OCA/USPS-T5-15 for only CAG A and B offices

      using the F263 strata definitions. (Instead of "A" or "B",

      use '555555,' '666666,' or '777777.')

b.   Please confirm that according to OCA/USPS-33, an F263 code

      of '777777' corresponds to one stratum containing CAGs A and

      B offices, but that SSR-90 indicates that CAG A and CAG B

      are two different strata. Please clarify the stratum

      '777777' definition.

c. According to OCA/USPS-33, an F263 code of '555555' defines a
stratum that corresponds to a group of large offices.
Please clarify whether this group consists of some CAG A
sampling stratum offices, all CAG A offices, or both CAGs A
and B offices.

d. Please confirm that each CAG A or CAG B office/finance
number belongs to one of the three "F263" strata. If you do
not confirm, please explain what other strata CAG A or B
offices could be assigned to.

e. Which sampling stratum contains offices (or finance numbers)
that were not in the sample in FY 1992, but were advanced to
CAG B status by FY 1995?

f. Which sampling stratum contains offices (or finance numbers)
that were not in the sample in FY 1992, but were advanced to
CAG A status by FY 1995?

g. Please provide internally consistent definitions of the IOCS
strata.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing

document upon all participants of record in this proceeding in

accordance with section 3.B(3) of the special rules of practice.

DAVID RUDERMAN
Attorney

Washington, D.C.   20268-0002
August 30, 1996